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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202 2466

FEB 13 1995
FEB 10 1995

ADMIN REC.

Ref. 8HWM-FF

Mr Steven Slaten
U.S Department of Energy
Rocky Flats Office
P.O Box 928
Golden, Colorado 80402-0928

Re: Operable Units 5 and 6,
Schedule Extension

Dear Mr. Slaten.

EPA received your December 15, 1994, letter requesting extensions of the delivery dates for the draft and final RCRA Facility Investigation/Remedial Investigation (RFI/RI) Reports for both Operable Unit (OU) 5 and OU 6.

Over the past month, EPA, the Colorado Department of Health and Environment, and your staff discussed the impacts of the requested extensions on the milestones of other affected OUs. It is our understanding that OU 2 will be impacted most significantly, yet no schedule extensions are foreseen for this OU or any others to incorporate the ecological risk assessment appropriately in the decision making process. Current plans are to integrate the results of the Woman and Walnut Creek watershed ecological risk assessments into the OU 2 FS no later than the detailed analysis of alternatives phase. The final RFI/RI Report for OU 2 will not contain the ecological risk assessment. This is acceptable to us.

In our judgement, re-scoping the ecological risk assessments to result in a defensible Record of Decision for the affected OUs constitutes good cause for the requested schedule extensions. Accordingly, we approve the following milestone dates:

OU 5

Draft RFI/RI Report
Final RFI/RI Report

November 1, 1995
April 2, 1996

OU 6

Draft RFI/RI Report
Final RFI/RI Report

October 2, 1995
February 21, 1996

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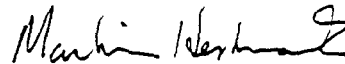
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We are concerned that these milestones may not adequately reflect the level of effort required to implement an ecological risk assessment on the watershed scale. For example, one key schedule assumption was that Oak Ridge's "Screening Benchmarks for Ecological Risk Assessment" would adequately address the chemicals detected at Rocky Flats. In reality, we have found that the database needs to be supplemented, requiring either development of additional benchmarks, or refinements to the chemicals of concern selection process. Either choice means additional time. Other examples of potential schedule impacts include coordination with the natural resource trustees and EPA Region 8's Biological Technical Assistance Group, and achieving consensus on the assessment and measurement endpoints.

We recommend that OU 5 and OU 6 schedules be re-examined by all parties at the time of submittal of the problem formulation technical memoranda for each OU. We anticipate additional schedule adjustments will be needed.

We look forward to working with your staff in accomplishing the important work ahead. Our point of contact on the ecological risk assessments for operable units 5 and 6 is Bonnie Lavelle, (303) 294-1067

Sincerely,



Martin Hestmark, Manager
Rocky Flats Project

cc. Joe Schieffelin, CDPHE
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